

STATE OF TENNESSEE

Office of the Attorney General



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Reply to:
Consumer Advocate and Protection Division
Attorney General's Office
P.O. Box 20207
Nashville, TN 37202

February 25, 2003

Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: TRA Tariff 03-00118 - Tennessee American Water Company Petition to Change
and Increase Certain Rates and Charges

Dear Chairman Kyle:

Enclosed is an original and fourteen copies of the Consumer Advocate and Protection
Division's Petition to Intervene in TRA Tariff 03-00118 - Tennessee American Water Company
Petition to Change and Increase Certain Rates and Charges. Copies are being furnished to
counsel of record for interested parties.

Sincerely,

Vance Broemel
VANCE BROEMEL,
Assistant Attorney General

cc: Counsel of Record
52476

**IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF TENNESSEE
AMERICAN AMERICAN WATER
COMPANY TO CHANGE AND
INCREASE CERTAIN RATES AND
CHARGES SO AS TO PERMIT IT TO
EARN A FAIR AND ADEQUATE RATE
OF RETURN ON ITS PROPERTY USED
AND USEFUL IN FURNISHING
WATER SERVICE TO ITS
CUSTOMERS**

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) **DOCKET NO. 03-00118**
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PETITION TO INTERVENE

Comes Paul G. Summers, the Attorney General for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of Attorney General (hereinafter "Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A), and petitions to intervene in this docket on behalf of the public interest because consumers may be adversely affected by the requested rate increase of Tennessee American Water Company. For cause, the Petitioner would show as follows:

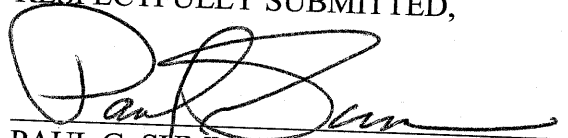
1. The Consumer Advocate Division of the Office of the Attorney General is authorized by Tenn. Code Ann. § 65-4-118 (c)(2)(A) to initiate a contested case and participate or intervene in proceedings to represent the interests of Tennessee consumers in accordance with the Uniform Administrative Procedures Act ("UAPA").

2. Tennessee American Water Company ("Tennessee American") is a company regulated by the Tennessee Regulatory Authority ("TRA"). Tennessee American sells water to consumers in the State of Tennessee. If the TRA approves the petition of Tennessee American in its present form, it would mean an increase of approximately 16% for residential customers and 7% for industrial customers. The dollar amount of the requested increase is \$3.5 million annually. The Consumer Advocate Division has reviewed the supporting documentation filed by Tennessee American and believes that the amount of the requested increase is too high.

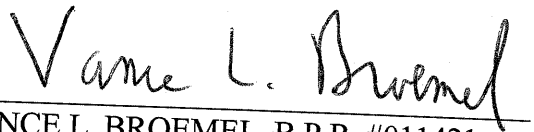
3. Only by intervening and participating in this proceeding can the CAPD work to protect the public interest.

Wherefore the Petitioner prays the Authority to grant its Petition to Intervene.

RESPECTFULLY SUBMITTED,



PAUL G. SUMMERS, B.P.R. #6285
Attorney General
State of Tennessee



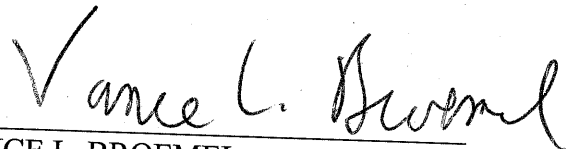
VANCE L. BROEMEL, B.P.R. #011421
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202
(615) 741-8733

Dated: February __, 2003

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or facsimile on February 25, 2003.

Ted G. Pappas, Esq.
Bass, Berry & Sims
AmSouth Center
315 Deadrick Street, Suite 2700
Nashville, TN 3737238-3001



VANCE L. BROEMEL
Assistant Attorney General